

**FACTS****WHAT DOES SORRENTO PACIFIC FINANCIAL, LLC (“SPF”) DO WITH YOUR PERSONAL INFORMATION?**

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| <b>WHY?</b>  | Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.               |
| <b>WHAT?</b> | The types of personal information we collect, and share depend on the product or services you have with us. This information can include: <ul style="list-style-type: none"> <li>▪ Social Security number and income</li> <li>▪ Assets and investment experience</li> <li>▪ Account transactions and risk tolerance</li> </ul> |
| <b>How?</b>  | All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons SPF chooses to share; and whether you can limit this sharing.                                 |

| Reasons we can share your personal information   | Does SPF share?   | Can you limit this sharing? |
|--|---|-----------------------------|
| <b>For our everyday business purposes –</b> such as to process and report your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | YES   | NO                          |
| <b>For our marketing purposes –</b> to offer our products and services to you  | NO  | We don’t share              |
| <b>For joint marketing with other financial companies</b>  | YES   | NO                          |
| <b>For our affiliates’ everyday business purposes –</b> information about your transactions and experiences  | YES   | NO                          |
| <b>For our affiliates’ everyday business purposes –</b> information about your creditworthiness  | NO  | We don’t share              |
| <b>Questions</b>   | 858-530-4400, or <a href="mailto:complianceadmin@cusonet.com">complianceadmin@cusonet.com</a> |                             |

**WHO WE ARE**

Who is providing this notice?

Sorrento Pacific Financial, LLC

**WHAT WE DO**

How does SPF protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. Other measures we employ include: (a) information access controls; (b) service provider oversight and confidentiality agreements; (c) proper disposal of customer information; and (d) periodic security training for personnel.

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|---|---|
| <p><b>How does SPF collect my personal information?</b></p> | <p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> <li>▪ Open an account or seek advice about your investments</li> <li>▪ Enter into an investment advisory contract</li> <li>▪ Tell us about your investment or retirement portfolio</li> <li>▪ Direct us to buy securities or to sell your securities</li> </ul> <p>We also collect your personal information from other companies.</p>                                   |
| <p><b>Why can't I limit all sharing?</b></p>                | <p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> <li>▪ Sharing for affiliates' everyday business purposes — information about your creditworthiness</li> <li>▪ Affiliates from using your information to market to you</li> <li>▪ Sharing for non-affiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p> |

**DEFINITIONS**

|                               |  |
|-------------------------------|--|
| <p><b>Affiliates</b></p>      | <p>Companies related by common ownership or control. Our affiliates include: CUSO Financial Services, LP, CFS Insurance &amp; Technology Services, LLC, NEXT Financial Group, Inc. Cadaret, Grant &amp; Co., Inc. Cadaret Grant Agency, Capital Strategy Group and Atria Wealth Solutions.</p> |
| <p><b>Non-affiliates</b></p>  | <p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <p>Your Representative's new firm if he or she leaves SPF and third-party investment companies you have authorized.</p>   |
| <p><b>Joint marketing</b></p> | <p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <p>SPF has an agreement with your bank to jointly offer investment services and insurance products.</p>  |

**OTHER IMPORTANT INFORMATION**

If your state offers greater protection than federal law, we will comply with the state requirements.

If you are an advisory client of SPF, our Form ADV Part 2 A and B is available upon request. The Form ADV summarizes the investment advisory services offered by SPF. In March 2019, SPF and the Securities and Exchange Commission ("SEC") entered into a settlement agreement pursuant to the SEC Share Class Selection Disclosure Initiative. Additional details are disclosed in the ADV. Should you desire a copy of the Form ADV, please contact your financial advisor.

For clients of a Representative who followed the Representative to SPF from another firm, if your Representative leaves SPF, and if agreed to by SPF, they may retain copies of your personal information to continue to serve you at the new firm. As a result, the Representative may share your information with the new firm but is otherwise required to keep confidential the personal information obtained from you while the Representative was affiliated with SPF and may use such information only to service your account(s). Other than as required by law, if you do not want us to share information with third parties, such as your Representative's new firm, please direct your request in writing, including your name and account number, to: Compliance Admin, Sorrento Pacific Financial, 10150 Meanley Drive, 1st Floor, San Diego, CA 92131.

European Union General Data Protection Regulations applicable to EU residents. Subject to certain exemptions, you have certain rights regarding personal information, including the right to request a copy of personal information that we hold. You have a right to be informed of the source of the information; the purposes, legal basis and methods of processing; and the entities to whom personal information may be transferred. You have a right to request that we rectify inaccurate personal information.

We are a broker-dealer, registered with the U.S. Securities and Exchange Commission (SEC) and the Municipal Securities Rulemaking Board (MSRB). MSRB provides municipal securities investors with certain protections which are described on their website: [www.MSRB.org](http://www.MSRB.org) The website contains an investor brochure that describes these protections, and how to file a complaint with an appropriate regulatory authority.

The Financial Industry Regulatory Authority (FINRA) requires that we provide you information regarding FINRA BrokerCheck, an online tool used to check the background of investment professionals. For additional information on BrokerCheck or FINRA, including an investor brochure that contains information describing BrokerCheck, call the FINRA BrokerCheck Hotline at (800) 289-9999 or access FINRA's website at [www.finra.org](http://www.finra.org).

